



PUBLIC NOTICE

2001 MAR -2 P 3: 04

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

RECEIVED

DA 01-332
February 22, 2001

**COMMON CARRIER BUREAU SEEKS COMMENT ON PROPOSED CHANGE TO SBC'S
PERFORMANCE MEASUREMENTS
ASD 01-17**

Comments Due: March 8, 2001

Reply Comments Due: March 15, 2001

The *SBC/Ameritech Merger Order* requires SBC Communications, Inc. ("SBC") to publicly file performance data demonstrating its progress in opening its local markets to competitors.¹ Specifically, SBC reports 20 performance measurements each month in the areas of operations support systems, provisioning, maintenance and repair, billing, and collocation.² If SBC's performance falls below certain standards of quality, the company must make payments to the United States Treasury.³

The *Merger Order* allows SBC and the Common Carrier Bureau ("Bureau") to make mutually agreeable changes to the performance measurements business rules on a semi-annual basis.⁴ During the most recent review, SBC asked the Bureau to approve to change one of its performance measurements, Measurement 6a, *Mean Installation Interval – POTS*. As described in the attached letter, SBC proposes to disaggregate its CIA Centrex offering from its other services. The Bureau seeks comment on SBC's proposal to assist our evaluation.⁵ Commenters should address the following questions.

- 1) Is the installation of CIA Centrex sufficiently different from other POTS to justify a separate disaggregation?

¹ Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95, and 101 of the Commission's Rules, CC Docket 98-141, Memorandum Opinion and Order, FCC 99-279 (rel. Oct. 8, 1999) ("*SBC/Ameritech Merger Order*" or "*Merger Order*"). The performance data are posted on the Internet at: <http://www.fcc.gov/ccb/mcot>.

² See *SBC/Ameritech Merger Order* at Appendix C, Attachment A.

³ See *id.* at Appendix C, Attachment A, para. 13; Federal Communications Commission Announces Year 2000 Common Carrier-related Enforcement Action Totals, *Public Notice* (Dec. 12, 2000).

⁴ See *SBC/Ameritech Merger Order* at Appendix C, Attachment A, para. 4.

⁵ See Letter from Sandra Wagner, Vice President – Federal Regulatory, SBC, to Carol Matthey, Deputy Chief, Common Carrier Bureau, FCC (Jan. 2, 2001). The letter, which includes SBC's proposed business rules changes, is attached to this Public Notice.

- 2) If so, is SBC's proposed four-day provisioning benchmark appropriate for non-fieldwork installations reasonable?
- 3) Is an exclusion for orders with a requested date greater than five business days appropriate?
- 4) What would be the effect of SBC's proposed changes on its overall performance for performance measurement 6a, including payments?

Commenters should also address any other relevant issues.

1. EX PARTE STATUS OF THIS PROCEEDING

Because this matter involves broad public policy issues, the Bureau will treat the proceeding as "permit but disclose" for purposes of the Commission's *ex parte* rules. See generally 47 C.F.R. §§ 1.1200-1.1216. Should circumstances warrant, the Bureau may designate this proceeding and all interrelated proceedings as restricted. As a "permit but disclose" proceeding, *ex parte* presentations will be governed by the procedures set forth in Section 1.1206 of the Commission's rules applicable to non-restricted proceedings.⁶

Parties making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must contain a summary of the substance of the presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required. See 47 C.F.R. § 1.1206(b)(2), as revised. Other rules pertaining to oral and written presentations are set forth in Section 1.1206 (b) as well. Interested parties are to file with the Commission Secretary, Magalie Roman Salas, 445 12th Street S.W., Washington, D.C. 20554, and serve Debbi Byrd of the Accounting Safeguards Division, Common Carrier Bureau, 445 12th Street S.W., 6-C316, Washington D.C. 20554, and International Transcription Service, Inc., 445 12th Street, S.W., CY-B402, Washington, D.C. 20554, with copies of any written *ex parte* presentations in these proceedings filed in the manner specified above.

2. FILING PROCEDURES

Interested parties may file comments and/or petitions to deny regarding SBC's request not later than March 8, 2001. Responses or oppositions to these comments and petitions may be filed not later than March 15, 2001. In accordance with Section 1.51(c) of the Commission's Rules, 47 C.F.R. §1.51(c), an original and four copies of all pleadings must be filed with the Commission's Secretary, Magalie Roman Salas, 445 12th Street, S.W., TW-A325, Washington, D.C. 20554. In addition, copies of each pleading must be filed with other offices in the following manner: (1) one copy with International Transcription Service, Inc., the Commission's duplicating contractor, 445 12th Street, S.W., CY-B402, Washington, D.C. 20554, (202) 857-3800; (2) one copy with Mark Stone, Accounting Safeguards Division, Common Carrier Bureau, 445 12th Street, S.W., Room 6-C365, Washington, D.C. 20554; and (3) six copies with Debbi Byrd, Accounting Safeguards Division, Common Carrier Bureau, 445 12th Street, S.W., Room 6-

⁶ An *ex parte* presentation is any communication (spoken or written) directed to the merits or outcome of a proceeding made to a Commissioner, a Commissioner's assistant, or other decision-making staff member, that, if written, is not served on other parties to the proceeding or, if oral, is made without an opportunity for all parties to be present. 47 C.F.R. § 1.1201.

C316, Washington, D.C. 20554.

In addition to filing paper comments, parties may also file comments using. The Commission's Electronic Comment Filing System (ECFS).⁷ Comments filed through the ECFS can be sent as an electronic file via the Internet to <[http:// www.fcc.gov/e-file/ecfs.html](http://www.fcc.gov/e-file/ecfs.html)>. Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, commenters should include their full name, Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. For filing instructions for e-mail comments, commenters should send an e-mail to ecfs@fcc.gov and should include the following words in the body of the message: "get form <your e-mail address.>" A sample form and directions will be sent in reply.

Copies of the applications and any subsequently filed documents in this matter may be obtained from International Transcription Service, Inc., 445 12th Street, S.W., CY-B402, Washington, D.C. 20554, (202) 857-3800. Electronic versions of the applications are also available on the FCC's Internet Home Page (<http://www.fcc.gov>) and through the Commission's Electronic Comment Filing System. To the extent that parties file electronic versions of responsive pleadings, such filings also will be available on the FCC's Internet Home Page and through the Commission's Electronic Comment Filing System. Copies of the applications and documents are also available for public inspection and copying during normal reference room hours at the Commission's Reference Center, 445 12th Street, S.W., CY-A257, Washington, D.C. 20554.

For further information, contact Mark Stone at (202) 418-0816.

Action by the Chief, Accounting Safeguards Division, Common Carrier Bureau, FCC.

⁷ See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24,121 (1998).

**ATTACHMENT
SBC REQUEST**

January 2, 2001

Ms. Carol E. Matthey
Deputy Chief, Common Carrier Bureau
Federal Communications Commission
445 - 12th Street, SW
Washington, D.C. 20554

RE: SBC/Ameritech Merger Order, CC Docket No. 98-141, ASD File No. 99-49

Dear Ms. Matthey:

As you know, the SBC/Ameritech Merger Conditions require a joint review of the twenty performance measurements on a semi-annual basis to determine whether measurements should be added, deleted, or modified. On November 30, 2000, SBC/Ameritech and the Common Carrier Bureau staff jointly held their second semi-annual review where the following change was proposed by SBC.

The disaggregation of performance measurement 6a, Mean Installation Interval - POTS, is requested to include a new service called "CIA Centrex." The CIA Centrex (Coordinated Integration Application Centrex) disaggregation requires the following changes: 1) a standard four day benchmark for the CIA Centrex no field work orders, and 2) an exclusion of CIA Centrex orders with customer requested due dates greater than five business days. Attached is a red-lined version of performance measurement 6a, which reflects the proposed changes.

As background information, CIA Centrex is a service that was requested by McLeod USA in the Ameritech states of Illinois and Wisconsin. Like other resellers, McLeod USA is using Ameritech's network to provide local services to their end users. However, the manner in which McLeod USA is providing service to their end users is significantly different from any other reseller currently in operation.

The typical resale process for a competitive local exchange carrier (CLEC) is to assume the end user's service "as is." Although the end user continues to receive telephone service from Ameritech, the service is sold by the CLEC. Since the end user continues to receive telephone service from Ameritech, there is no change required to the central office equipment or outside facilities, only record work to migrate the billing from the retail end user to the wholesale CLEC.

Unlike the process described above, the CIA Centrex service currently being provided to McLeod requires Ameritech to disconnect the existing POTS service and move the end user customer's telephone number to the McLeod USA Centrex common block established in the serving central office. This change triggers the assignment of a new class of service and new Uniform Service Order Codes (USOCs). In addition to the physical work required in the central office, adding the end user's telephone number into the Centrex common block requires central office translation work on the switch and other programming changes for associated software features. To minimize the time the end user is actually

without service, Ameritech has a CIA group dedicated to the coordination of each McLeod USA order, which can contain thousands of telephone numbers. This CIA group coordinates across the various network departments to move the end user telephone numbers from the central office equipment to the new Centrex common block. It is this additional process, put in place to insure a smooth migration and to minimize customer service disruption, that causes the provisioning interval of CIA Centrex to differ from the provisioning of other resale POTS.

Due to the difference in provisioning intervals, SBC/Ameritech requests approval from the FCC to include CIA Centrex service field work, and CIA Centrex no field work, as new disaggregations of performance measurement 6a, Mean Installation Interval – POTS in the FCC performance measurements. The CIA Centrex no field work disaggregation will have a four day benchmark, all other disaggregations remain parity comparisons. The performance results for CIA Centrex have been reported separately at the state level since August, 2000. My staff has provided Mr. Mark Stone of your staff with documentation showing the history and background of this service and would be happy to answer any questions you or your staff may have regarding the CIA Centrex service. Your consideration of this proposal is appreciated.

Please feel free to call me or Al Syeles at 202-326-8828.

Sincerely,

Sandra Wagner

CC: Mr. Mark Stone
Mr. Al Syeles

MEAN INSTALLATION INTERVAL – POTS

Average business days from application date to completion date for N,T, C orders.

- ~~Excludes CLEC customer-caused misses~~
- ~~Field Work orders – excludes customer requested due dates beyond the offer date greater than 5 business days~~
- ~~No Field Work orders – excluded if order applied for before 3:00 PM; and the due date requested is not same day; and if order applied for after 3:00 PM; and the due date requested is beyond the next business day~~
- ~~CIA Centrex excluded if customer requested due date is greater than 5 business days~~
- ~~Excludes all orders except Orders that are not N, T, and C orders~~
- ~~Orders where CLECs are charged expedite charges~~
- ~~Excludes Weekends and Holidays~~
- ~~Excludes official company service from Retail~~

The clock starts on the Application Date, which is the day that Ameritech receives a correct Service Order. The clock stops on the Completion Date which ~~that is~~ the day that Ameritech personnel complete the service order activity. Orders are included in the month they are closed completed. There are 2 types of orders in the measurement. Same Day Due orders (defined as distribution time EQUAL or BEFORE 3:00 PM and Application Date = Distribution Date = Due Date. Next Day Due orders (defined as distribution time AFTER 3:00 PM and Application Date = Distribution Date and Due Date is 1 business day after Application Date. If the order is Same Day Due, then (Completion – Application Date). If the order is Next Day Due, then ((Completion – Next Business Day) + 1). UNE Combos COMBOs, are also reported at order level. If an order is completed on a Saturday, Sunday or Holiday, Ameritech will include that day in the calculation of the interval.

Geographic, per State agreements

POTS

- ~~Field Work (FW)~~
- ~~No Field Work (NFW)~~
- ~~Business class of service~~
- ~~Residence class of service~~
- CIA Centrex

UNE Combo

- ~~Field Work (FW)~~
- ~~No Field Work (NFW)~~
- Business class of service
- Residence class of service

$\frac{[\sum(\text{completion date} - \text{application date})]}{(\text{Total number of orders completed})}$	Reported for CLEC, all CLECs and Ameritech, and Ameritech <u>affiliate</u>.
Benchmark: Resale POTS parity between Field Work compared to Ameritech Field Work (N, T, C order types) and No Field Work compared to Ameritech Retail Field Work (N, T, C order types). UNE Combo Parity between Field Work compared to Ameritech Field Work (N, T, C order types) and No Field Work compared to Ameritech Retail Field Work. (N, T, C order types) <u>CIA Centrex parity between Field Work compared to Ameritech Centrex Field Work (N, T, C Order types) and No Field Work compared to a 4 day interval.</u>	